IN THE UNITED STATES BANKRUPTCY COURT NORTHERN DISTRICT OF ALABAMA, NORTHERN DIVISION

IN RE:)
)
V&K JACKSON, INC.,) CASE NO. 22-82237-CRJ11
EIN: XX-XXX4893) CHAPTER 11, SUBCHAPTER V
Debtor.)

APPLICATION TO EMPLOY ATTORNEY

COMES NOW V&K Jackson, Inc, as debtor and debtor-in-possession in the above-styled Chapter 11 case ("Debtor"), and requests this Court for appointment of an attorney pursuant to 11 U.S.C. § 327 and, as grounds for this Application would show unto the Court as follows:

- 1. Debtor filed a petition for relief under Chapter 11, Subchapter V of the Bankruptcy Code on December 29, 2022, as a debtor-in-possession, and desires to employ the law firm of Maples Law Firm, P.C. (the "Law Firm") as its attorneys in this case.
- 2. The members of the Law Firm are admitted to practice in this Court, have knowledge and experience in bankruptcy law practice, and are well qualified to represent the Debtor in this case.
- 3. In the continuance of Debtor's business and the pending Chapter 11 case, it is necessary for various professional legal services to be rendered for which it is necessary to retain attorneys. These services include:
 - a. Preparing pleadings and applications and conducting examinations incidental to any related proceedings or to the administration of this case;
 - b. Developing the relationship of the status of the Debtor to the claims of creditors in this case;
 - c. Advising the Debtor of its rights, duties, and obligations as Debtor operating under Chapter 11 of the Bankruptcy Code;
 - d. Taking any and all other necessary action incident to the proper preservation and administration of this Chapter 11 case; and

e. Advising and assisting the Debtor in the formation and preservation of a plan pursuant to Chapter 11 of the Bankruptcy Code, the disclosure statement, and any and

all matters related thereto.

4. To the best of Debtor's knowledge and as evidenced by the attached declaration,

no member of the Law Firm holds or represents an interest adverse to this estate and all members

are "disinterested" persons under the Bankruptcy Code.

5. Debtor proposes to compensate the Law Firm for the services of its members

according to their standard hourly rate as that rate may from time to time be adjusted during the

pendency of this Chapter 11 case. The current rate for the bankruptcy partner that will be the

Debtor's main contact is \$395.00 per hour. The rate for associates charged by the Law Firm is

currently \$250.00 per hour. The rate for paralegals charged by the Law Firm is currently \$100.00

to \$145.00 per hour. All payments will be subject to approval and allowance by the Court.

WHEREFORE, Debtor prays that it be authorized to obtain, appoint, and employ the Law

Firm as its attorneys to represent it in this case under the terms and conditions provided above.

DATED December 29, 2022.

V&K JACKSON, INC.

/s/ William Kent Jackson

WILLIAM KENT JACKSON., PRESIDENT

/s/ Stuart M. Maples

STUART M. MAPLES

(ABS-1974-S69S)

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ATTORNEY'S DECLARATION

COMES NOW Stuart M. Maples and in support of the application of the above Debtor for employment of an attorney in this Chapter 11 states as follows:

- 1. I am a member of the firm of Maples Law Firm, P.C. (the "Law Firm") and have been duly admitted to practice in this Court.
- 2. To the best of my knowledge, each member of the Law Firm is a disinterested person in this case and no member represents or holds any interest adverse to the estate in the matters upon which the firm is to be engaged.
- 3. To the best of my knowledge, no member of the Law Firm has any connection with the Debtor, its creditors, or any other party in interest or their respective attorneys including the Bankruptcy Trustee or any employee of the Bankruptcy Administrator's Office in this District.
- 4. The Law Firm has agreed to represent the Debtor in this Chapter 11 case upon the terms and conditions set forth in the Debtor's Application.
- 5. The Law Firm has not agreed to split or share any compensation received in this matter with any other person or entity.

Dated December 29, 2022.

SWORN TO AND SUBSCRIBED BEFORE ME ON

DECEMBER 29, 2022.

STUART M. MAPLES

(ABS-1974-s69S)

MAPLES LAW FIRM, PC

200 Clinton Avenue West, Suite 1000

Huntsville, Alabama 35801

Tel: (256) 489-9779

Fax: (256) 489-9720

smaples@mapleslawfirmpc.com

CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the foregoing by the method stated below on the following on December 29, 2022.

Richard Blythe Bankruptcy Administrator P. O. Box 3045 Decatur, AL 35602

20 Largest Unsecured Creditors

All parties requesting notice

<u>/s/ Stuart M. Maples</u>

OF COUNSEL